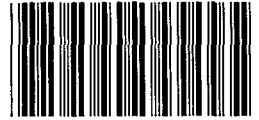


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October 6, 1992

Ref: 8HWM-ER

SF FILE NUMBER

MEMORANDUM

TO: Randy Perlis, Region VIII TAT Team Leader
Ecology and Environment

FILE PLAN

2.0

FROM: Mike Zimmerman, OSC
Emergency Response Branch (8HWM-ER)

THRU: Karen Mooar, TAT DPO
Emergency Response Branch (8HWM-ER)

SUBJECT: Monitoring Well for Richardson Flats

TAT's response to UPCM's allegations was very well constructed and very professional. The technical analysis provided in the response demonstrated a thorough understanding of the complexities of monitoring well installation and the Site's surrounding hydrogeology. It is acknowledged that TAT believes the second monitoring well was screened properly and may not present future problems. However, the monitoring well's installation raised an issue which EPA must take into account.

EPA has reviewed all the technical documentation concerning monitoring well number 2's installation supplied by both UPCM and TAT. After this review, EPA's technical experts agree that TAT has presented good reasons to believe that the landfill is not underlain with a uniform aquitard, or clay layer, as alleged by UPCM. The fact remains, however, that the top of the gravel packing for monitoring well number 2 is at or near the same elevation as the bottom of the landfill. EPA believes that the closeness of the gravel packing to the bottom of the landfill will result in continuing unresolved disputes with UPCM over the validity of sampling results taken from the monitoring well, as well as, the argument that, given the right hydrogeologic conditions and assuming that a uniform, unfractured aquitard exists under the landfill, the monitoring well could act as a conduit for migration of water between the landfill and what lies underneath.

In light of the possibility of unresolvable disputes with UPCM over the installation of monitoring well number 2 and the stage at which the listing process for the Site is in, ERB respectfully requests that the existing monitoring wells be sampled, monitoring well number 2 be plugged, and an off-set well

be correctly installed at the earliest possible convenience prior to the on-set of winter, all in accordance with the attached TTDS.

Attachment

cc: Karen Tomimatsu, TAT II PO

FCD:October 7, 1992:cmz:cmz:tat.ltr